

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

DENNIS MURPHY, as Personal Representative
of the ESTATE OF DANIEL TURNER, deceased,
and WALTER and TAMARA TURNER,

Plaintiffs,

v.

No. 1:19-cv-00639-RB-JFR

THE CITY OF FARMINGTON, et al.,

Defendants.

MOTION TO FILE EXHIBIT UNDER SEAL

Defendants hereby submit this Motion to File Exhibit Under Seal. In support of this Motion, Defendants state:

1. Defendants filed their Motion for Summary Judgment on Count I of the Complaint on October 15, 2020. [Doc. 51].
2. Exhibit C to Doc. 51 is a confidential dashcam video documenting the interaction between Defendant Officers and Daniel Turner immediately before, during and after Mr. Turner's death.
3. The video was noted to be logged with the Court Clerk on October 16, 2020. [Doc. 51-3 and Doc. 52]. Defendants seek to submit this video to be filed under seal and filed an Amended Notice of Logging on October 16, 2020. [Doc. 54].
4. Counsel for Plaintiffs do not oppose this Motion.

WHEREFORE, Defendants hereby request that the Court enter an order allowing the video to be logged by the Court Clerk under seal.

Respectfully submitted,

WIGGINS, WILLIAMS & WIGGINS
A Professional Corporation

Electronically Filed

By /s/ Patricia G. Williams

Patricia G. Williams

Attorneys for Defendants

1803 Rio Grande Blvd., N.W. (87104)

P.O. Box 1308

Albuquerque, New Mexico 87103-1308

(505) 764-8400

pwilliams@wwlaw.us

We hereby certify that on this 16th day
of October, 2020, the foregoing was filed electronically
through the CM/ECF system, which caused all
parties or counsel of record to be served
by electronic means, as more fully reflected on the
Notice of Electronic Filing.

WIGGINS, WILLIAMS & WIGGINS, P.C.

By /s/ Patricia G. Williams

Patricia G. Williams